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Peter R. Willis, NJ Bar \*

Honorable Kevin G. Callahan ♦  
Of Counsel

November 23, 2020

**VIA ECF ONLY**

Honorable Kevin N. Fox  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: United States v. Terrence Chalk**  
**20 Mag. 11830**

Dear Judge Fox:

I am writing this letter to Your Honor in response to the Government's letter dated November 19, 2020. In said letter, the Government seeks to amend the Court's November 17, 2020 order, which imposes a notice requirement on the "Chairman's Fund" account for any transfer in an amount in excess of \$10,000. The Government requests that Your Honor impose additional restrictions on Mr. Chalk's finances, specifically, that *"the defendant must not spend, transfer or withdraw, \$10,000 or more in a single transaction from the Wells Fargo Bank Account ending in Account Number x70032 and bearing the name 'Greenlight Investment Partner Inc.'"*

The Government states in its letter to Your Honor that it requests the modification of the Court's November 17, 2020 order to make Mr. Chalk's obligation "clearer." However, the Government's request does not seek to clarify the Court's order as to notice for the "Chairman's Fund" account, but seeks to impose additional restrictions on a separate account, to wit, the "Greenlight Investment Partner Inc." account. This request is made by the Government without any showing as to why the proposed restriction is necessary to protect investors. In fact, that account is used specifically to pay investors their returns as recently as this past Friday. If the Court were to grant the Government's request it would in essence stop or significantly restrict Mr. Chalk's ability to pay investors their financial returns, which is exactly what the Government complains of in the allegations against him.

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For these reasons, we respectfully object to the Government's proposed modification of the Court's November 17, 2020 order.

Respectfully submitted,

/s/ Peter R. Willis

Peter R. Willis, Esq.

Cc: Martin Bell, A.U.S.A. (by ECF)  
Robert Boone, A.U.S.A. (by ECF)